

EXHIBIT C

Suarez v. SGWS**Defendant's Proposed Trial Exhibits**

| | Bates Range | Date | Document Description | Plaintiff's Objection |
|-----|--------------------|-------------------|---|---|
| 1. | 1001-1083 | 05/2014 | SGWS Employee Handbook | |
| 2. | 1176 | 04/01/18-06/01/18 | NY RIF List | Contains Irrelevant Information (whether employees signed severance agreements), hearsay, best evidence |
| 3. | 1342-1343 | 2/18 | RIF Letter Template | Best Evidence, relevancy, authenticity, hearsay |
| 4. | 1483 | 4/10/18 | Suarez Termination Letter | |
| 5. | 895-900 | 05/05/16 | WMI Administrator Requisition and Job Description | |
| 6. | 1639-1646 | 03/03/16 | Suarez's Applications for WMI Administrator Position | |
| 7. | 1657 | | Candidate List for WMI Administrator Position | |
| 8. | 1413-1414 | 05/04/16 | Suarez Offer Letter for WMI Administrator Position | |
| 9. | 891-894 | 05/18/16 | WMI Inventory Control Manager Requisition and Job Description | |
| 10. | 901 | | WMI Inventory Control Manager Job Description | |
| 11. | 2591-2595 | 02/28/14 | Tonisha Durant Application for Inventory Control Manager Position | |
| 12. | 2596-2597 | 05/04/16 | Tonisha Durant WMI Inventory Control Manager Offer Letter | |
| 13. | 1476-1482 | 04/05/10 | 2010 Performance Evaluation for Suarez | |
| 14. | 1469-1475 | 06/15/11 | 2011 Performance Evaluation for Suarez | |
| 15. | 1465-1468 | 05/02/12 | 2012 Performance Evaluation for Suarez | |
| 16. | 1456-1460 | 02/01/13 | 2013 Performance Evaluation for Suarez | |
| 17. | 1449-1455 | 05/20/14 | 2014 Performance Evaluation for Suarez | |
| 18. | 2665-2669 | 01/17 | 2016 Performance Evaluation for Suarez | Authenticity |
| 19. | 2671-2672 | 01/18 | 2017 Performance Evaluation for Suarez | Authenticity |
| 20. | 2700-2703 | 01/17 | 2016 Performance Evaluation for Melissa Johnson | |
| 21. | 2704-2706 | 04/18 | 2017 Performance Evaluation for Melissa Johnson | |

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| 22. | 1445-1448 | 09/02/16 | Memo from Wilkinson to Suarez regarding WMI Administrator Performance Expectations | |
| 23. | 1444 | 11/04/16 | Verbal Warning for Suarez Performance | |
| 24. | 1438-1440 | 01/11/17 | Performance Improvement Plan for Suarez | |
| 25. | 1441-1443 | 01/18/17 | Written Warning for Suarez | |
| 26. | 1436-1437 | 12/01/17 | Final Written Warning for Suarez | |
| 27. | 1447-1448 | | Johnson's Cycle Counting Daily Procedure for Suarez | |
| 28. | 524 | | Johnson's Task List for Suarez | |
| 29. | 2488 | 08/04/16 | Miscellaneous Emails Regarding Suarez's Performance To: Randall From: Johnson CC: Meyer Subject: Maria Suarez training | Authenticity, Hearsay ¹ |
| 30. | 2255 | 08/04/16 | Miscellaneous Emails Regarding Suarez's Performance To: Randall From: Kohn CC: Toohig Subject: Re: Maria Suarez Training | <i>See n. 1</i> |
| 31. | 1925-1926 | 08/17/16- 08/18/16 | Miscellaneous Emails Regarding Suarez's Performance From: Kohn To: Toohig CC: Randall Subject: RE: Sitting with Daniel | <i>See n. 1</i> |
| 32. | 2227-2229 | 10/07/16 | Miscellaneous Emails Regarding Suarez's Performance | <i>See n. 1</i> |

¹ With regard to all emails, Plaintiff requests that a proper foundation be laid and that the witness be prepared to testify regarding how the records were kept; and how records were searched for and produced in response to Plaintiff's request for production of documents.

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| | | | Subject: FW: Clarification of job expectations | |
| 33. | 2361-2364 | 10/22/16 | Miscellaneous Emails Regarding Suarez's Performance To: Wilkinson From: Randall CC: Toohig, Kohn Subject: FW: clarification of job expectations | <i>See n. 1</i> |
| 34. | 2040-2041 | 10/29/16 | Notes from meeting with Wilkinson, Johnson, and Suarez regarding job expectations | Authenticity, Hearsay |
| 35. | 2217 | 11/03/16 | Miscellaneous Emails Regarding Suarez's Performance To: Jean-Charles From: Toohig Subject: RE: Maria Suarez | <i>See n. 1</i> |
| 36. | 2164-2209 | 11/23/16-12/01/16 | Miscellaneous Emails Regarding Suarez's Performance with Attachments To: Jean-Charles From: Toohig Subject: FW: Maria's Training | <i>See n. 1</i> |
| 37. | 1878-1923 | 11/28/16 | Email Re: Melissa Documentation to Suarez re: Performance with Attachments From: Randall To: Toohig CC: Kohn Subject Maria's Training | <i>See n. 1</i> |
| 38. | 2068-2069 | 11/28/16-12/05/16 | Miscellaneous Emails Regarding Suarez's Performance To: Toohig From: Cooper CC: Kohn Subject: Re: Maria Suarez – part 3 | <i>See n. 1</i> |

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| 39. | 2075 | 11/28/16- 12/05/16 | Miscellaneous Emails Regarding Suarez's Performance To: Kohn From: Cooper CC: Toohig Subject: Re: Maria Suarez – part 3 | <i>See n. 1</i> |
| 40. | 2077-2080 | 11/28/16- 12/05/16 | Miscellaneous Emails Regarding Suarez's Performance To: Toohig From: Cooper Subject: Re: Maria Suarez – part 3 | <i>See n. 1</i> |
| 41. | 2485 | 11/28/16- 12/05/16 | Miscellaneous Emails Regarding Suarez's Performance To: Kohn From: Cooper CC: Toohig, Randall Subject: Maria Suarez training – part 3 | <i>See n. 1</i> |
| 42. | 2059-2060 | 11/30/2016 | Miscellaneous Emails Regarding Suarez's Performance To: Suarez From: Meyer Subject: more counts processing | <i>See n. 1</i> |
| 43. | 2088-2163 | 12/03/16 | Miscellaneous Emails Regarding Suarez's Performance with Attachments To: Toohig From: Kohn CC: Randall Subject: Maria Suarez – severe performance matters | <i>See n. 1</i> |
| 44. | 2063-2067 | 12/06/16 | Miscellaneous Emails Regarding Suarez's Performance | <i>See n. 1</i> |

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| | | | <p>To: Kohn From: Toohig CC: Cooper</p> <p>Subject: RE: This needs to stop</p> | |
| 45. | 2045-2053 | 12/8/16 | <p>Miscellaneous Emails Regarding Suarez's Performance</p> <p>To: Toohig From: Cooper</p> <p>Subject: Suarez FWW 12-6-16</p> | <i>See n. 1</i> |
| 46. | 2038-2039 | 12/17/16 | <p>Miscellaneous Emails Regarding Company Reorganization</p> <p>To: Toohig From: Kohn</p> <p>Subject: Reorg basics</p> | <i>See n. 1</i> |
| 47. | 1344-1345 | 12/19/16- 12/20/16 | <p>Miscellaneous Emails Regarding Suarez's Performance with Johnson Notes</p> <p>From: Eric Meyer To: Suarez, Wilkinson, Heffel</p> <p>Subject: Item # 93845</p> | <i>See n. 1</i> |
| 48. | 880-881 | 12/27/16 | <p>Miscellaneous Emails Regarding Suarez's Performance with Johnson Notes</p> <p>Subject: Item# 451234 Let001</p> | <i>See n. 1</i> |
| 49. | 878-879 | 12/29/16 | <p>Miscellaneous Emails Regarding Suarez's Performance with Johnson Notes</p> <p>From: Barry Finkelstein</p> <p>Subject: Re: #339109 Pinnacle</p> | <i>See n. 1</i> |
| 50. | 873-875 | 01/04/17 | <p>Johnson Notes on Emails Regarding Suarez's Performance</p> <p>Subject: 64 negative locations</p> | <i>See n. 1</i> |

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| 51. | 876 | 01/04/17 | Miscellaneous Emails Regarding Suarez's Performance From: Barry Finkelstein Subject: item #357467 | <i>See n. 1</i> |
| 52. | 877 | 01/04/17 | Miscellaneous Emails Regarding Suarez's Performance From: Barry Finkelstein Subject: Item #410010 Santa Rita | <i>See n. 1</i> |
| 53. | 2353 | 1/17/17 | Miscellaneous Emails Regarding Suarez's Performance To: Suarez From: Wilkinson Subject: Re: overtime | <i>See n. 1</i> |
| 54. | 2446-2447 | 1/24/17 | Miscellaneous Emails Regarding Suarez's Performance To: Wilkinson, Meyer, Ciambriello From: Suarez Subject: RE: Sent from Snipping Tool | <i>See n. 1</i> |
| 55. | 2430 | 01/25/17 | Miscellaneous Emails Regarding Suarez's Performance To: Suarez From: Wilkinson CC: Toohig Subject: PIP Review Tuesday 1/24/17 | <i>See n. 1</i> |
| 56. | 2339 | 3/8/17 | Miscellaneous Emails Regarding Suarez's Performance To: Suarez From: Wilkinson Subject: PIP review from 2/7/17 | <i>See n. 1</i> |

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| 57. | 1976 | 03/11/17- 03/21/17 | Miscellaneous Emails Regarding Suarez's Performance To: Toohig From: Wilkinson CC: Randall Subject: RE: Maria Suarez | <i>See n. 1</i> |
| 58. | 1975 | 03/21/17 | Miscellaneous Emails Regarding Suarez's Performance To: Suarez From: Wilkinson CC: Toohig Subject: PIP review from 2/7/17 | <i>See n. 1</i> |
| 59. | 1974 | 03/21/17 | Miscellaneous Emails Regarding Suarez's Performance To: Suarez From: Wilkinson CC: Toohig Subject: PIP meeting notes 2/14/2017 | <i>See n. 1</i> |
| 60. | 2337 | 3/29/17 | Miscellaneous Emails Regarding Suarez's Performance To: Suarez From: Wilkinson Subject: PIP Meeting for March 8, 2017 | <i>See n. 1</i> |
| 61. | 2333 | 4/7/17 | Miscellaneous Emails Regarding Suarez's Performance To: Suarez From: Wilkinson Subject: re: PIP Meeting for March 29, 2017 | <i>See n. 1</i> |
| 62. | 2331 | 4/13/17 | Miscellaneous Emails Regarding Suarez's Performance | <i>See n. 1</i> |

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| | | | <p>To: Suarez From: Wilkinson</p> <p>Subject: re: PIP Meeting for April 7</p> | |
| 63. | 1973 | 04/21/17 | <p>Miscellaneous Emails Regarding Suarez's Performance</p> <p>To: Toohig From: Wilkinson</p> <p>Subject: FW: PIP Meeting from April 13</p> | <i>See n. 1</i> |
| 64. | 1965-1966 | 04/27/17- 05/01/17 | <p>Miscellaneous Emails Regarding Suarez's Performance</p> <p>To: Toohig From: Elisa</p> <p>Subject: RE: Maria Suarez</p> | <i>See n. 1</i> |
| 65. | 1870-1876 | 8/29/17 | <p>Miscellaneous Emails Regarding Suarez's Performance with Johnson Notes</p> <p>To: Jean-Charles, Metzger From: Wilkinson CC: Durant, Randall</p> <p>Subject: Maria Suarez</p> | <i>See n. 1</i> |
| 66. | 1961-1962 | 08/29/17- 09/01/17 | <p>Miscellaneous Emails Regarding Suarez's Performance</p> <p>To: Jean-Charles From: Toohig</p> <p>Subject: FW: Melisa Decker Johnson</p> | <i>See n. 1</i> |
| 67. | 2220 | 10/26/17 | <p>Miscellaneous Emails Regarding Suarez's Performance</p> <p>To: Suarez From: Wilkinson CC: Randall, Johnson, Toohig</p> <p>Subject: WMI Admin Training</p> | <i>See n. 1</i> |

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| 68. | 2283 | 11/21/17 | Miscellaneous Emails Regarding Suarez's Performance To: Wilkinson From: Metzger CC: Randall, Jean-Charles Subject: Feedback: Maria Suarez | <i>See n. 1</i> |
| 69. | 902-903 | | Maria Suarez Office Photos (Old and New) | Authenticity |
| 70. | 1346-1378 | 11/23/16-02/27/17 | Cycle Count Records for 11/23/16, 12/01/16, 12/09/16, 12/15/16, 12/26/16, 12/29/16, 01/03/17, 01/17/17, 02/27/17 (With Melissa Johnson Notes) | |
| 71. | 1177-1334 | 11/15/16-02/27/17 | Cycle Count Records (11/15/16, 11/23/16, 12/01/16, 12/12/16, 12/15/16, 12/20/16, 12/22/16, 12/23/16, 12/26/16, 12/27/16, 12/09/16, 12/29/16, 01/03/17, 01/10/17, 01/11/17, 01/17/17, 01/21/17, 02/27/17) (With Melissa Johnson Notes) | |
| 72. | 1513-1529 | 11/23/16-02/27/17 | Cycle Count Records (11/23/16, 12/01/16, 12/12/16, 02/27/17) (With Melissa Johnson Notes) | |
| 73. | 321-353 | 11/23/16 | Cycle Count Records for 11/23/16 | |
| 74. | 381-412 | 01/06/17 | Cycle Count Records for 01/06/17 | |
| 75. | 413-423 | 12/21/16 | Cycle Count Records for 12/21/16 | |
| 76. | 424-449 | 12/29/16 | Cycle Count Records for 12/29/16 | |
| 77. | 450-495 | 12/01/16 | Cycle Count Records for 12/01/16 | |
| 78. | 496-523 | 12/12/16 | Cycle Count Records for 12/12/16 | |
| 79. | 524-546 | 01/03/17 | Cycle Count Records for 01/03/17 | |
| 80. | 547-578 | 01/04/17 | Johnson Notes & Cycle Count Records for 01/04/17 | |
| 81. | 579-588 | 01/25/16-01/05/17 | Cycle Count Records for 01/25/16- 01/05/17 | |
| 82. | 589-616 | 12/15/16 | Cycle Count Records for 12/15/16 | |
| 83. | 617-678 | 12/20/16 | Cycle Count Records for 12/20/16 | |
| 84. | 679-689 | 12/21/16 | Johnson Notes & Cycle Count Records for 12/21/16 | |

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| 85. | 690-729 | 12/29/16 | Johnson Notes & Cycle Count Records for 12/29/16 | |
| 86. | 321-353 | 11/23/16 | Cycle Count Records for 11/23/16 | |
| 87. | 354-380 | 01/01/17- 02/26/17 | Cycle Count Records for 01/01/17-02/26/17 | |
| 88. | 815-856 | 10/07/16 | Maria Suarez Deposition Transcript | |
| 89. | 265-266 | 5/2/13 | Email To: John Wilkinson From: Maria Suarez Subject: Job classification | |
| 90. | P287-291 | 6/20/13 | Memo re: Warehouse Inventory Control From: Dina Wald-Margolis To: Beth Toohig | |
| 91. | P293-296 | 8/12/13 | Memo re: Warehouse Inventory Control – Findings Meeting From: Dina Wald-Margolis To: Beth Toohig | |